

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

In re: Federal Mogul Global, Inc., *et al.*, (Bankruptcy Case No. 01-10578)(RTL)

Debtors.

THE OFFICIAL COMMITTEE OF
ASBESTOS CLAIMANTS and
ERIC D. GREEN, as the
LEGAL REPRESENTATIVE FOR
FUTURE ASBESTOS CLAIMANTS,

Plaintiffs,

v.

ASBESTOS PROPERTY
DAMAGE COMMITTEE,

Defendant.

Civil Action No. 05-59 JHR

**CORRECTED VERSION OF THE
PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW
SUBMITTED BY THE OFFICIAL COMMITTEE OF ASBESTOS CLAIMANTS
AND THE LEGAL REPRESENTATIVE FOR FUTURE ASBESTOS CLAIMANTS**

The Official Committee of Asbestos Claimants and Eric D. Green, as the legal representative for the future asbestos-related personal injury claimants (together the “**Plaintiffs**”), hereby submit a Corrected Version of their Proposed Findings of Fact and Conclusions of Law as instructed by the Court following the completion of the June 14-21, 2005 hearing regarding the estimation of the aggregate value of the present pending and expected future asbestos personal injury and wrongful death claims against T&N Limited, a U.K. company, and its non-U.S. subsidiary companies.

Since June 30, 2005, when Plaintiffs filed the original version of their Proposed Findings of Fact and Conclusions of Law, the parties have received the final corrected version of the hearing transcript ("Hr'g Tr.") which incorporated the corrections to the original transcript agreed upon by the parties.¹ As expected, the page and line numbers for some pages of the corrected and final version of the hearing transcript have changed slightly due to these corrections, requiring us to submit a revised set of proposed findings that reflect the proper page and line numbers for the citations to the final and corrected version hearing transcript.

Attached hereto as Attachment A (and also submitted in electronic format) is the Corrected Version of the Plaintiffs' Proposed Findings of Fact and Conclusions of Law which incorporates the corrected citations to the hearing transcript. No substantive changes to the record citations or the Plaintiffs' Proposing Findings have been made; the only changes are to citations to the hearing transcript in instances where the page or line number has shifted due to the court reporters' corrections. Attached hereto as Attachment B is a "red-line" of the Corrected Version of the Plaintiffs' Proposed Findings of Fact and Conclusions of Law showing the changes between this version of our proposed Findings and the original version of Plaintiffs' Proposed Findings of Fact and Conclusions of Law filed on June 30, 2005.

[Remainder of page intentionally left blank.]

¹ All corrections to the original hearing transcript were non-substantive changes to correct spelling or transcription errors.

Dated: July 11, 2005
Wilmington, Delaware

Respectfully submitted,

CAPLIN & DRYSDALE, CHARTERED
Elihu Inselbuch
399 Park Avenue
New York, New York 10022
Telephone: (212) 319-7125
Facsimile: (212) 644-6755

YOUNG CONAWAY STARGATT & TAYLOR, LLP



James L. Patton, Jr. (No. 2202)

Edwin J. Harron (No. 3396)

Rolin Bissell (No. 4478)

Maribeth L. Minella (No. 4185)

1000 West Street, 17th Floor

P.O. Box 391

Wilmington, Delaware 19899-0391

Telephone: (302) 571-6600

Facsimile: (302) 571-1253

-and-

CAPLIN & DRYSDALE, CHARTERED
Nathan D. Finch
Danielle K. Graham
One Thomas Circle, N.W.
Washington, DC 20005
Telephone: (202) 862-5000
Facsimile: (202) 429-3301

Attorneys for Legal Representative for
Future Asbestos Claimants

-and-

CAMPBELL & LEVINE, LLC

Marla R. Eskin (No. 2989)
Kathleen J. Campbell (No. 4229)
800 N. King Street, Suite 300
Wilmington, Delaware 19801
Telephone: (302) 426-1900
Facsimile: (302) 426-9947

Attorneys for Official Committee of
Asbestos Claimants

Dated: July 11, 2005
Wilmington, Delaware

Respectfully submitted,

CAPLIN & DRYSDALE, CHARTERED
Elihu Inselbuch
399 Park Avenue
New York, New York 10022
Telephone: (212) 319-7125
Facsimile: (212) 644-6755

YOUNG CONAWAY STARGATT & TAYLOR, LLP

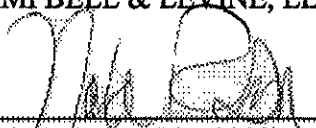
James L. Patton, Jr. (No. 2202)
Edwin J. Harron (No. 3396)
Rolin Bissell (No. 4478)
Maribeth L. Minella (No. 4185)
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, Delaware 19899-0391
Telephone: (302) 571-6600
Facsimile: (302) 571-1253

Attorneys for Legal Representative for
Future Asbestos Claimants

CAPLIN & DRYSDALE, CHARTERED
Nathan D. Finch
Danielle K. Graham
One Thomas Circle, N.W.
Washington, DC 20005
Telephone: (202) 862-5000
Facsimile: (202) 429-3301

-and-

CAMPBELL & LEVINE, LLC



Marla R. Eskin (No. 2989)
Kathleen J. Campbell (No. 4229)
800 N. King Street, Suite 300
Wilmington, Delaware 19801
Telephone: (302) 426-1900
Facsimile: (302) 426-9947

Attorneys for Official Committee of
Asbestos Claimants